UNITED STATES DISTRICT COURT DISTRICT OF SOUTH DAKOTA SOUTHERN DIVISION

JUN JE

UNITED STATES OF AMERICA,

TERRI DUNKELBERGER,

CR. 10 - 40064

Plaintiff,

INDICTMENT

vs.

EMBEZZLEMENT AND THEFT OF

LABOR UNION ASSETS

Defendant.

29 U.S.C. § 501(c)

The Grand Jury Charges:

From on or about the 1st day of January, 2008, through on or about the 31st day of December, 2009, in the District of South Dakota, Terri Dunkelberger, while holding the position of financial secretary treasurer of the Amalgamated Transit Union Local 1356, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$24,148,98, all in violation of 29 U.S.C. § 501(c).

A TRUE BILL:

Forepérson

BRENDAN V. JOHNSON UNITED STATES ATTORNEY

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